

MORRISON COHEN LLP
Attorneys for the claimants,
Charles Moore and Edward Park
909 Third Avenue
New York, New York 10022-4784
(212) 735-8600
Joseph T. Moldovan, Esq.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
In re
LEHMAN BROTHERS HOLDINGS INC., et al.,

Chapter 11
Case No. 08-13555 (JMP)

Debtors.

(Jointly Administered)

----- X

**DECLARATION OF E. DANIEL JAMES IN SUPPORT OF RESPONSE
BY CHARLES MOORE AND EDWARD PARK TO DEBTORS'
315TH AND 318TH OMNIBUS OBJECTIONS TO CLAIMS**

I, E. Daniel James, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 authorizing unsworn declarations, that the following statements are true and correct:

Unless otherwise indicated, all facts set forth in this Declaration are based upon my experience, knowledge, and information concerning the Debtors' operations and financial affairs. If called upon to testify, I could and would competently testify to the facts set forth in this Declaration.

1. I was hired by Shearson Lehman Hutton ("Shearson Lehman") in 1988. After it was no longer owned by American Express Co., Shearson Lehman became a public company in the 1990's and changed its name to Lehman Brothers Holdings, Inc. ("LBHI" or "Holdings"). My employment with Shearson Lehman continued uninterrupted after it became a public company and changed its name to Holdings. I had no written employment agreement.

2. Holdings was commonly known and referred to as Lehman Brothers.

3. In 2008 I was a Holdings employee with the titles of Managing Director and Head of Merchant Banking for North America. I also served on the Lehman Brothers Investment Committee.

4. In 2008 I reported to Charles Ayres, Managing Director and Head of Global Merchant Banking for Lehman Brothers. Mr. Ayres served on the Lehman Brothers Investment Committee, and he reported to Michael Odrich, a Managing Director and the Head of the Private Equity business of Holdings. Mr. Odrich also served on the Lehman Brothers Investment Committee. Mr. Odrich reported to George Walker, who served on the Executive Committee of the Holdings Board of Directors.

5. Mr. Odrich's tenure with Holdings preceded mine. He joined Shearson Lehman in the mid-1980's and remained with the firm after it became a public company and changed its name to Lehman Brothers Holdings, Inc.

6. In late 2007 and early 2008, hiring an employee to work at the level of a Managing Director in the Merchant Banking Group for Holdings required an official approval of the Executive Committee of the Holdings Board. This requirement applied to Charles Moore and Edward Park.

7. Merchant Banking employees at Lehman Brothers worked for Holdings.

8. Lehman Brothers, Inc. ("LBI") served as the "paymaster" for many Lehman Brothers employees, including me, merely as a matter of administrative convenience. However, LBI was not the entity for whom I or other Lehman Brothers Merchant Bankers worked.

Executed on September 13, 2012.

By: /s/ E. Daniel James
E. Daniel James